



Department of Toxic Substances Control



Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

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Gray Davis
Governor

April 4, 2003

Mr. Luciano A. Ocampo, P.E.
Remedial Project Manager
Department of the Navy
Southwest Division
Navel Facilities Engineering Command
1220 Pacific Highway
San Diego, California 92132-5190

CLOSURE OF INDUSTRIAL WASTE WATER TREATMENT PLANTS (IWTPs) 25 AND 32 LOCATED AT THE ALAMEDA POINT FACILITY, FORMERLY ALAMEDA NAVAL AIR STATION, ALAMEDA CALIFORNIA, EPA# CA2 170 023 236

Dear Mr. Ocampo:

Per your request during your phone conversation with Mr. Dean Wright of the Department of Toxic Substances Control (DTSC) on April 2, 2003, DTSC is sending this letter to briefly describe the rationale used to determine that revised closure plans are necessary for IWTPs 25 and 32 at the Alameda Point Facility.

As described in Section 1.2, Background And Approach of the Closure Plan Clarification – Industrial Wastewater Treatment Plant, Building 32, NAS Alameda, Alameda California (March 4, 1996), the original closure plan for this unit was based on a lessee or purchaser utilizing the existing equipment and the level of clean up was intended to confirm only that no incompatible chemicals remained that would affect this similar future use. DTSC understood that the closure plan for IWTP 25 was also written assuming a similar use purpose. Since there is now no lessee or purchaser for these units, the Navy shall complete the unit closure according to the California Code of Regulations, Title 22, Section 66264.197(a) which states:

“At closure of a tank system, the owner or operator shall remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste, and manage them as hazardous waste...”

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

Mr. Luciano A. Ocampo

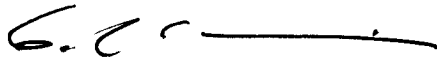
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Based on the above regulations, the revised closure plans shall be submitted for DTSC review and approval. To demonstrate successful removal or decontamination of hazardous constituents, the Navy shall take verification samples from equipment, soil and groundwater. The revised closure plans shall include decontamination and confirmation sampling procedures sufficient to determine clean closure which means no detections of hazardous constituents, or the constituent concentrations below background levels, or below the acceptable risk-based levels.

The Navy shall submit the revised closure plan for IWTP 25 by April 30, 2003, and the closure plan for IWTP 32 by May 15, 2003, per the current schedule provided by the Navy. If the proposed schedule will change, please provide DTSC a revised schedule by April 17, 2003, indicating when the revised closure plans will be submitted. If you have any other questions, please contact Mr. Dean Wright of my staff at (916) 255-6528.

Sincerely,



Wei-Wei Chui, Section Chief
Standardized Permits and Corrective Action Branch

cc: Mr. Dean Wright, R.G.
Standardized Permits and Corrective Action
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826

cc: DIANE SILVA, ADMIN (13 COPIES)